

Received by the Pro Se Office 8/24/2020-KC

Received by Docketing 9/1/2020 - AIH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANDRE DENNIS

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ AUG 24 2020 ★

BROOKLYN OFFICE

Plaintiff,

[Insert full name of plaintiff/prisoner]

CIVIL RIGHTS COMPLAINT
42 U.S.C. § 1983

JURY DEMAND

YES NO _____

-against-

NASSAU COUNTY;

JOHN DOE 1; SHERIFF VERA FLOOD

JANE DOE 1; JOHN DOE 5

JOHN DOE 2; JOHN DOE 6

JOHN DOE 3;

JOHN DOE 4;

Defendant(s).

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I.]

- I. Parties: (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff ANDRE DENNIS

If you are incarcerated, provide the name of the facility and address:

NASSAU COUNTY CORRECTIONAL CENTER

100 CARMAN AVE

EAST MEADOW, NY 11554

Prisoner ID Number: 17000955

If you are not incarcerated, provide your current address:

Telephone Number: _____

B. List all defendants. You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1

NASSAU COUNTY
Full Name
MUNICIPALITY
Job Title

Address

Defendant No. 2

JOHN DOE I
Full Name
CORRECTION OFFICER
Job Title

100 CARMAN AVE
EAST MEADOW, NY 11554
Address

Defendant No. 3

JANE DOE I
Full Name
CORRECTION OFFICER
Job Title
100 CARMAN AVE

EAST MEADOW, NY 11554
Address

Defendant No. 4

JOHN DOE 2

Full Name

CORRECTION OFFICER

Job Title

100 CARMAN AVE

EAST MEADOW, NY 11554
Address

Defendant No. 5

JOHN DOE 3

Full Name

CORRECTION OFFICER

Job Title

100 CARMAN AVE

EAST MEADOW, NY 11554
Address

II. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 1/2 by 11 sheets of paper as necessary.)

Where did the events giving rise to your claim(s) occur? IN THE MAIN

BUILDING OF NASSAU COUNTY CORRECTIONAL CENTER
DORM (B3C)

When did the events happen? (include approximate time and date) SEPTEMBER, 21
2018 BETWEEN 1:30 P.M AND 2:30 P.M.

DEFENDANT NO. 6

JOHN DOE 4

CORRECTION OFFICER

100 CARMAN AVE

EAST MEADOW, NY 11554

DEFENDANT NO. 7

SHERIFF 'VERA FLUOD'

SHERIFF OF NASSAU COUNTY

CORRECTIONAL CENTER IN 2018.

DEFENDANT NO. 8

JOHN DOE 5

CORRECTION OFFICER

100 CARMAN AVE

EAST MEADOW, NY 11554

DEFENDANT NO. 9

JOHN DOE 6

CORRECTION OFFICER

100 CARMAN AVE

EAST MEADOW, NY 11554

H 2000
H 2000

not available

not available

Peter Kippelman et al.

not available

MY CONSTITUTIONAL RIGHTS THAT WERE VIOLATED
BY DEFENDANTS.

CLAIMS:

- ①. MY 8TH AMENDMENT WAS VIOLATED BY ALL DEFENDANTS.

- ②. ~~RECKLESSNESS~~ RECKLESSNESS
- ③. CARELESSNESS
- ④. NEGLIGENCE
- ⑤. NEGLECT
- ⑥. PAIN AND SUFFERING
- ⑦. DELAY IN PROPER MEDICAL ATTENTION

JOHN DOE 1, 2, 3, 4 & 6 WERE APPOINTED TO MY DORMING AREA & FAILED TO BE ON THEIR SET POST (ONE CLO SITTING IN HOUSING AREA), AND FAILED TO DO THEIR 15-30 MIN. WALK THREW DORM AREA TO MAKE SURE THINGS WERE OK AND ALL INMATES WERE SAFE.

JANE DOE 1 & ~~1~~ JOHN DOE'S 1, 2, 3, 4, 5 & 6 FAILED TO GET ME PROPER MEDICAL ATTENTION IN A TIMELY FASHION.

BEING IN NASSAU CORRECTIONAL CENTER, IM UNDER THEIR 'CARE, CUSTODY, AND CONTROL'. WHILE UNDER THEIR 'CARE, CUSTODY, AND CONTROL', I WAS STABBED OVER 12 TIMES AND LOST PARTIAL VISION IN MY RIGHT EYE. THEY 'FAILED' TO CARE FOR ME DUE TO THEIR NEG~~E~~GANCE, RECKLESSNESS, NEGLECT AND CARELESS-NESS.

THEIR ARE RULES 'NASSAU COUNTY' IMPLEMENTS THAT ARE TO BE FOLLOWED SEEING THAT THE 'OVERSEE' THE CORRECTIONAL FACILITY, STAFFING, MEDICAL ETC.! THE SHERIFF AS WELL WAS PUT IN POSITION TO 'MAKE SURE' ALL 'RULES' AND 'PROCEDURES' WERE FOLLOWED.

AT CANTERBURY HAD A BEEF & I TALKED
ABOUT THE FISH AT CANTERBURY'S. HE TALKED ABOUT
A FISH RESTAURANT HIS DAUGHTER WORKED IN. THEY TRIED THE
WORST FISH IN THE WORLD. SO I TALKED TO THE CANTERBURY'S
ABOUT IT. THEY TALKED ME INTO GOING TO THE RESTAURANT.
WE WENT THERE AND HAD THE WORST FISH
IN THE WORLD. I TALKED THEM OUT OF GOING BACK
TO THE RESTAURANT. THEY WERE SO SICK FROM EATING THE FISH
THAT THEY WERE GOING TO GET A HOTEL ROOM.
I TALKED THEM OUT OF IT. THEY WERE SO SICK
FROM EATING THE FISH THAT THEY WERE GOING TO GET A HOTEL ROOM.
I TALKED THEM OUT OF IT. THEY WERE SO SICK
FROM EATING THE FISH THAT THEY WERE GOING TO GET A HOTEL ROOM.
I TALKED THEM OUT OF IT. THEY WERE SO SICK
FROM EATING THE FISH THAT THEY WERE GOING TO GET A HOTEL ROOM.

PERIODIC VITAMIN TREATMENT CAN BE USEFUL
FOR THOSE WITH SENSITIVE SKIN OR THE
SKIN IS ABLE TO ABSORB VITAMIN D FROM
THE SUN. FOR THOSE WITH SENSITIVE SKIN,
EQUIP YOURSELF WITH VITAMIN D CREAM.

Facts: (what happened?) AS I WAS ON A PHONE CALL WITH MY GIRLFRIEND, I WAS STABBED OVER 12 TIMES AND HIT IN MY EYE WITH A 'SOAP INSIDE OF A SOCK', BY A GROUP OF INMATES. I WAS REFUSED MEDICAL FOR 2 HOURS. THE CORRECTION OFFICERS 'DID NOT' DO THEIR 15-30MIN WALK, NOR WAS THERE A CORRECTION OFFICER ON POST. WHEN THE CORRECTION OFFICER 'FINALLY' ARRIVED, I WAS ON THE FLOOR BLEEDING FROM MY STAB WOUNDS, AND TOLD TO RETURN TO MY CELL UNTIL THEY COULD TEND TO ME.

II.A. Injuries. If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

I RECEIVED NUMEROUS STAB WOUNDS AND PERMANENT PARTIAL LOSS OF VISION TO MY RIGHT EYE. I WAS GIVEN A TECHNIC SHOT, STITCHES AND PRESCRIBED GLASSES. ALSO I HAD TO SEE MENTAL HEALTH FOR PARANOIA IN GROUP SETTINGS.

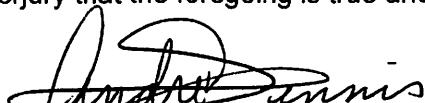
III. Relief: State what relief you are seeking if you prevail on your complaint.

\$10 MILLION DOLLARS FOR, "PAIN AND SUFFERING,
NOMINIGENCE, NEGLECT, RECKLESSNESS, CARELESSNESS
AND DELAY IN PROPER MEDICAL TREATMENT."

I declare under penalty of perjury that on 8/18/2020, I delivered this
(date)
complaint to prison authorities at NASSAU COUNTY CORRECTIONAL CENTER to be mailed to the United
(name of prison)
States District Court for the Eastern District of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8/18/2020


Signature of Plaintiff

NASSAU COUNTY CORRECTIONAL CENTER
Name of Prison Facility or Address if not incarcerated

100 CARMAN AVE

EAST MEADOW, NY 11554

Address

17000955
Prisoner ID#

ALL JANE OR JOHN DOE'S WERE REPORTING OFFICERS WHO ARRIVED ON THE SCENE, OR OFFICERS APPOINTED TO MY DORMING AREA AT THE TIME OF ASSAULT.

DESCRIPTION'S

- ① JOHN DOE 1: WHITE MALE APPOINTED TO MY DORMING AREA WITH A FULL BEARD, MEDIUM BUILD, AND A HAIRCUT, ABOUT 5'9"-6'0.
- ② JANE DOE 1: REPORTING OFFICER WHO ARRIVED TO SCENE. WHITE FEMALE, ABOUT 5'3"-5'5", SKINNY, LONG BLACK HAIR.
- ③ JOHN DOE 2: WHITE MALE APPOINTED TO MY DORMING AREA. MEDIUM BUILD, CLEAN CUT, WITH BALD HEAD, ABOUT 5'11.
- ④ JOHN DOE 3: WHITE MALE APPOINTED TO MY DORMING AREA, ABOUT 5'9"-5'11", BALD HEAD, BEARD AND A LITTLE MUSCULAR.
- ⑤ JOHN DOE 4: WHITE MALE APPOINTED TO MY DORMING AREA, SKINNY, MINI BUZZ CUT, CLEAN CUT. ABOUT 5'7"-5'8.

the ~~same~~ day ~~as~~ you will be able
to receive it in about one week.
I am sure you will be satisfied.

If you require any further information
or the statement in French, I will be
glad to supply it at your convenience.

As you can see from my letter, I am
now in a position to offer you a
good service at a reasonable price.

Please let me know if you would like
any further information or if you have
any other questions.

I hope you will be satisfied with my
service and I hope to do more work
for you in the future.

Yours sincerely,
John Smith

- ⑥ John Doe 5'; BLACK MALE REPORTING OFFICER
WHO ARRIVED TO THE SCENE. ABOUT 6'0, MEDIUM
BUILD WITH FULL BEARD.
- ⑦ John Doe 6'; WHITE MALE APPOINTED TO MY
DORMING AREA. WORE ~~Glasses~~ GLASSES AND
WAS ABOUT 5'6 VERY SKINNY.

but I don't think it's just that
when I'm doing these things I'm doing them
on my own initiative
but I think ~~that~~ with the intent
of what I'm doing.

ANDRE DENNIS

CC# 17000955

100 CADMAN AVE

EAST MEADOW, NY 11554

FIRST • CLASS



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7.60



CLERK OF U.S.
DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST

BROOKLYN, NY 11201